S W O P E ■ R O D A N T E

VIA FEDERAL EXPRESS: 8770 7560 7296

Shukura L. Ingram, Esq.
Jeffrey E. Tompkins, Esq.
Thomas Kennedy Sampson & Tompkins LLP
3355 Main Street
Atlanta, GA 30337

RE: Camacho v. Nationwide
U.S. District Court, Northern District of Georgia
Civil Action No. 1:11-cv-03111-AT

Dear Ms. Ingram and Mr. Tompkins:

Enclosed please find Plaintiffs' Offer of Settlement to Nationwide under O.C.G.A. § 9-11-68.

Please feel free to call with any questions.

Sincerely,

Darrell W. Hinson

Date: 11-11-11

Enclosure

DALE SWOPE* ■ ANGELA RODANTE* ■ LISHA BOWEN*
BRANDON CATHEY‡ ■ HENRY GYDEN* ■ DARRELL HINSON‡ ■ KATHRYN LEE*
MARC MATTHEWS* ■ STEPHANIE MILES* ■ SHEA MOXON* ■ BRENT STEINBERG* ■ ELIZABETH ZWIBEL*

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UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

JESUS CAMACHO, surviving spouse of Stacey Camacho, and LeJEAN NICHOLS, as Administratrix of the Estate of Stacey Camacho, Plaintiffs, vs. NATIONWIDE MUTUAL INSURANCE COMPANY, Defendant.	)	CIVIL ACTION FILE NO.: 1:11-cv-03111-AT

PLAINTIFFS' OFFER OF SETTLEMENT
PURSUANT TO O.C.G.A. § 9-11-68

Plaintiffs, JESUS CAMACHO, and LeJEAN NICHOLS, as Administratrix of the Estate of Stacey Camacho, do hereby make the following offer pursuant to O.C.G.A. § 9-11-68 to settle a tort claim for the money specified in the offer and to enter into an agreement dismissing the claim or to allow judgment to be entered accordingly.

1. This offer of settlement is made pursuant to O.C.G.A. § 9-11-68.

2. The parties making the offer of settlement are Plaintiffs, JESUS

CAMACHO, surviving spouse of Stacey Camacho, and LeJEAN NICHOLS, as Administratrix of the Estate of Stacey Camacho. The party to whom the offer of settlement is being made is Defendant, NATIONWIDE MUTUAL INSURANCE COMPANY.

3. This offer of settlement, if accepted, will resolve all claims.

4. The relevant conditions are as follows:

    a. Pursuant to §9-11-68(c), this offer of settlement must be accepted within 30 days and must be accepted in writing.

    b. If Defendant pays the total amount specified in this offer of settlement within 30 days of acceptance, Plaintiffs will dismiss all claims with prejudice.

    c. If Defendant accepts the offer but elects not to pay the total amount specified in this offer of settlement within 30 days of acceptance, judgment will be entered against NATIONWIDE MUTUAL INSURANCE COMPANY in the amount of this offer of settlement.

5. The total amount of this offer of settlement is: $4,583,000.00.

6. The amount proposed to settle any claim for punitive damages is Zero Dollars ($0.00). If the offer of settlement is accepted, all

claims, including punitive damages, will be resolved.

7. The amount of this offer of settlement includes all attorneys' fees and all other expenses which are or could be part of any of the Plaintiffs' claims.

This 11 day of November, 2011.

Darrell W. Hinson
Georgia Bar No. 356789
(darrellh@swopelaw.com)
Swope Rodante, P.A.
Suite 3300
191 Peachtree Street
Atlanta, GA 30303
Tel: (404)736-3729
Fax: (404) 736-3736
Attorney for Plaintiffs

CERTIFICATE OF SERVICE

This is to certify that I have this day a copy of *PLAINTIFFS' OFFER OF SETTLEMENT PURSUANT TO O.C.G.A. § 9-11-68* was served upon Defendant's counsel in the foregoing matter with by statutory overnight delivery in an envelope addressed as follows:

Shukura L. Ingram, Esq.
Jeffrey E. Tompkins, Esq.
Thomas Kennedy Sampson & Tompkins LLP
3355 Main Street
Atlanta, GA 30337

This 11 day of November, 2011.

Darrell W. Hinson
Georgia Bar No. 356789
(darrellh@swopelaw.com)
Swope Rodante, P.A.
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191 Peachtree Street
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Tel: (404)736-3729
Fax: (404) 736-3736
Attorney for Plaintiffs

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Shukura Ingram /Jeffrey Tompkins Phone 404-688-4503

Thomas Kennedy Sampson & Tompkins

3355 Main Street

Dept./Floor/Suite/Room

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- [x] FedEx Standard Overnight — Next business afternoon.* Saturday Delivery NOT available.

2 or 3 Business Days

- [ ] NEW FedEx 2Day A.M. — Second business morning.* Saturday Delivery NOT available.
- [ ] FedEx 2Day — Second business afternoon.* Thursday shipments will be delivered on Monday unless SATURDAY Delivery is selected.
- [ ] FedEx Express Saver — Third business day.* Saturday Delivery NOT available.

5 Packaging * Declared value limit $500.

- [x] FedEx Envelope*
- [ ] FedEx Pak*
- [ ] FedEx Box
- [ ] FedEx Tube
- [ ] Other

6 Special Handling and Delivery Signature Options

- [ ] SATURDAY Delivery — NOT available for FedEx Standard Overnight, FedEx 2Day A.M., or FedEx Express Saver.
- [ ] No Signature Required — Package may be left without obtaining a signature for delivery.
- [x] Direct Signature — Someone at recipient's address may sign for delivery. Fee applies.
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Does this shipment contain dangerous goods? One box must be checked.

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